

Exhibit 2

California Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
California – Meta Proposal

Search Terms: Meta made its most recent counterproposal on December 5, 2024 to the California Department of Health Care Services (“DHCS”), Health and Human Services Agency (“HHSA”), and the Mental Health Services Oversight and Accountability Commission (“MHSOAC”). At a high level, Meta’s proposal involves requiring combinations of relevant terms to occur in the same document as one another and, where appropriate, within certain proximity to other terms as set forth below.

#	Social Media Terms
1	Any of [“social media”, “social network”, meta, facebook, insta!, messenger, whatsapp, youtube, tiktok, twitter, snap!, roblox, bytedance, discord, reddit, tumblr, reddit, pinterest, FB, IG, YT, twitch, “horizon worlds”] w/150 of any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
	Harm Terms
2	Any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!] w/150 of [[“social media”] AND [meet!, report!, stud!, article, survey!, program!, grant!, bill!, legislat!, prevent!, deceptive, decei!, fraud!, defraud!, cheat!, lie!, misrepresent!, mislead!, schem!, exploit!, trick!, conceal!, hide, omit!, downplay!, suppress!, “cover up”, “Consumer Protection Act”, “consumer protection”]]
3	“social media” AND any of [“algorithmic recommendation,” “algorithmic sequencing,” “image filters,” “multiple user accounts,” “infinite scroll,” “ephemeral content features,” “autoplay,” “quantification of likes,” “display of likes,” “audiovisual alerts,” “haptic alerts”]
4	Any of [“Senate Bill 976,” SB976, “SB 976,” “Senate Bill 60,” SB60, “SB 60,” “Assembly Bill 587,” AB587, “AB 587,” “Assembly Bill 2273,” AB2273, “AB 2273,” “Assembly Bill 1934,” “AB 1934,” AB1934, “Assembly Bill 1949,” AB1949, “AB1949”] AND any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!] AND “social media”
5	“youth risk behavior survey”
6	Any of [wellness, wellbeing, well-being, “mental health”, “TMH”, anxi!, anti-anxi!, depress!, antidepress!, “attention deficit”, “ADHD”, posttraumatic, “bi-polar”, “bi polar”, bipolar, “BPD”, insomnia, therap!, counsel!, treatment!] w/150 of any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!,

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	pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
7	Any of [“pro-ana”, “BMI”, obes!, anorexi!, bulimi!, orthorexi!, dysmorph!, binge, purge, suicid!, “self harm”, “self-harm”, selfharm, unalive, cutting!] AND any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
8	Any of [bully!, bullie!, cyberbull!, harass!, sextort!, transphob!, homophob!, racis!, sexis!, groom!, pedophil!] w/150 of any of [child!, youth!, kid!, teen!, tween!, adolescen!, young, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
9	Any of [hook!, dopamine, rabbithol!, spiral, “social reward”, “social approval”, “screen time”, screentime, staytime, timespent, “time spent”, “engagement”, “mandatory break”, “limiting tool”, “habit loop”, “operant conditioning”, “impulse control”] w/150 of any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
10	Any of [eat! w/3 (problem!, issue!, trouble!, difficult!, disorder!, disab!, agitat!, behav!, insufficient, depriv!)]
11	Any of [sleep! w/3 (problem!, issue!, trouble!, difficult!, disorder!, disab!, agitat!, behav!, insufficient, depriv!)]
12	Any of [negative w/3 (appearance, experience, affect!, effect!)] w/150 of any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
13	Any of [compar! w/5 (appearance, social, other!, negative)]
14	Any of [body w/3 (accept!, dissatisfaction, positiv!, image, dysmorph!)]
15	Any of [self w/3 (esteem, harm, control, injur!, mutilat!, regulat!)] w/150 of any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!]
16	Any of [Covid!, coronavirus, pandemic, lockdown, “lock! down”, quarantine, “social! distanc!”] w/150 of any of [wellness, wellbeing, well-being, “mental health”, “TMH”, anxi!, anti-anxi!, depress!, antidepress!, “attention deficit”, “ADHD”, posttraumatic, “bi-polar”, “bi polar”, bipolar, “BPD”, insomnia, therap!, counsel!, treatment!, “pro-ana”,

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	“BMI”, obes!, anorexi!, bulimi!, orthorexi!, dysmorph!, binge, purge, suicid!, “self harm”, “self-harm”, selfharm, unalive, cutting!, [negative w/3 (appearance, experience, affect!, effect!)], [self w/3 (esteem, harm, control, injur!, mutilat!, regulat!)]
17	Any of [heroin, crack, cocaine, fent!, opio!, opia!, meth, methamphetamine, oxy, oxycontin, painkiller!, narcotic!, (drug! w/5 abuse)] w/150 [wellness, wellbeing, well-being, “mental health”, “TMH”, anxi!, anti-anxi!, depress!, antidepress!, “attention deficit”, “ADHD”, posttraumatic, “bi-polar”, “bi polar”, bipolar, “BPD”, insomnia, therap!, counsell!, treatment!, “pro-ana”, “BMI”, obes!, anorexi!, bulimi!, orthorexi!, dysmorph!, binge, purge, suicid!, “self harm”, “self-harm”, selfharm, unalive, cutting!, [negative w/3 (appearance, experience, affect!, effect!)], [self w/3 (esteem, harm, control, injur!, mutilat!, regulat!)]
18	Any of [“ACE!”, “adverse childhood experience”, “adverse childhood experiences”]
18	Any of [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!] w/150 of [[“social media”] AND [meet!, report!, stud!, article, survey!, program!, grant!, bill!, legislat!, prevent!, deceptive, decei!, fraud!, defraud!, cheat!, lie!, misrepresent!, mislead!, schem!, exploit!, trick!, conceal!, hide, omit!, downplay!, suppress!, “cover up”, “Consumer Protection Act”, “consumer protection”]]

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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the California AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Health and Human Services Agency	Kim Johnson*	Secretary
Health and Human Services Agency	Virginia Franco*	Special Assistant to the Secretary
Health and Human Services Agency	Brendan McCarthy*	Acting Undersecretary
Health and Human Services Agency	Tran Duong*	Staff Services Manager
Health and Human Services Agency	Jared Goldman*	General Counsel
Health and Human Services Agency	Maggie Schuster*	Attorney
Health and Human Services Agency	Daniel Torres*	Chief Equity Officer
Health and Human Services Agency	Maureen Keffer*	Assistant Equity Officer
Health and Human Services Agency	John Ohanian*	Director and Data Officer
Health and Human Services Agency	Adam Dondro*	Agency Information Officer
Health and Human Services Agency	Sonia Herrera*	Deputy Secretary for Office of Administrative Services (OAS)
Health and Human Services Agency	Miguel Juaregui*	Retired Annuitant, Information Technology Specialist, OAS
Health and Human Services Agency	Miguel Salazar*	Information Technology Specialist, OAS
Health and Human Services Agency	Faisal Aziz*	Information Technology Specialist, OAS

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Health and Human Services Agency	Sarah Aguirre*	Staff Services Manager, OAS
Health and Human Services Agency	Evan Gerber I*	Information Technology Associate, OAS
Health and Human Services Agency	Francis Brown*	Administrative Assistant, OAS
Health and Human Services Agency	Samantha Lui*	Deputy Secretary for Office of Legislative Affairs (OLA)
Health and Human Services Agency	Sarah Logue*	Associate Secretary, OLA
Health and Human Services Agency	Anya Shutovska*	Associate Secretary, OLA
Health and Human Services Agency	Eric Castillo*	Associate Governmental Program Analyst, OLA
Health and Human Services Agency	Susan Bernier*	Associate Governmental Program Analyst, OLA
Health and Human Services Agency	Allyson Velez*	Associate Governmental Program Analyst, OLA
Health and Human Services Agency	Kimberly Chen*	Acting Deputy Secretary for Office of Program and Fiscal Affairs (OPFA)
Health and Human Services Agency	Darci Delgado*	Assistant Secretary, OPFA
Health and Human Services Agency	Julie Souliere*	Assistant Secretary, OPFA
Health and Human Services Agency	K. Jones*	Assistant Secretary, OPFA
Health and Human Services Agency	Debra Cooper*	Assistant Secretary, OPFA
Health and Human Services Agency	Nathanial Mitchell*	Assistant Secretary, OPFA
Health and Human Services Agency	Sami Gallegos*	Deputy Secretary for Office of External Affairs (OEA)
Health and Human Services Agency	Jim Suennen*	Associate Secretary, OEA
Health and Human Services Agency	Rodger Butler*	Assistant Secretary, OEA
Health and Human Services Agency	Vincent Martinez*	Information Officer, OEA
Health and Human Services Agency	Juliann Binder*	Information Officer, OEA
Health and Human Services Agency	Corrin Buchanan*	Deputy Secretary for Office of Policy and Strategic Planning (OPSP)

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Health and Human Services Agency	Josephina Baca*	Staff Services Analyst, OPSP
Health and Human Services Agency	Sohil Sud*	Director of Children and Youth Behavioral Health Initiative (CYBI)
Health and Human Services Agency	Stefanie Boltz*	Health Program Specialist, CYBI
Health and Human Services Agency	Brittney Blake*	Staff Services Manager, CYBI
Health and Human Services Agency	Stephanie Welch*	Deputy Secretary for Office of Behavioral Health (OBH)
Health and Human Services Agency	Anh Thu Bui*	Public Health Medical Administrator, OBH
Health and Human Services Agency	Austin Dickman*	Staff Services Manager, OBH
Health and Human Services Agency	Ali Vangrow*	Staff Services Manager, OBH
Health and Human Services Agency	Hailey Shapiro*	Associate Governmental Program Analyst, OBH
Health and Human Services Agency	Diana Ramos*	Surgeon General (OSG)
Health and Human Services Agency	Alana Bui*	Staff Service Manager, OSG
Health and Human Services Agency	Lauren Groves*	Special Advisor, OSG
Health and Human Services Agency	Colette Cobb*	Health Program Specialist, OSG
Health and Human Services Agency	Julie Rooney*	Director of Communications, OSG
Health and Human Services Agency	Berit Mansour*	Communications Support, OSG
Health and Human Services Agency	Juan Carlos Arguello*	Chief Health Policy Officer, Office of Youth and Community Restoration
Health and Human Services Agency	Barbara Clopton*	Communications Staff Services Manager, Center for Data Insights and Innovation (CDII)
Health and Human Services Agency	Jaykob Zaleski*	Communications Associate Governmental Program Analyst, CDII
Health and Human Services Agency	David Reiner*	California Initiative to Advance Precision Medicine (CIAPM)

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Health and Human Services Agency	Theresa Spezzano*	Equity Officer, CIAPM
Health and Human Services Agency	Ramon Martinez*	Science Communications Officer, CIAMP
Health and Human Services Agency	Saga Barberis*	Project Administrator, CIAPM
Department of Health Care Services	Paula Wilhelm*	Deputy Director – Behavioral Health
Department of Health Care Services	Erika Cristo*	Asst. Deputy Director – Behavioral Health
Department of Health Care Services	Marlies Perez*	Division Chief – Community Services Division
Department of Health Care Services	Ilana Rub*	Asst. Division Chief – Community Services Division
Department of Health Care Services	Denise Galvez*	Branch Chief – CSD Prevention & Youth Branch
Department of Health Care Services	Autumn Boylan*	Deputy Director – Office of Strategic Partnerships
Department of Health Care Services	Carol Gallegos*	Deputy Director – Legislative & Government Affairs
Department of Health Care Services	Melissa Rolland*	Asst. Deputy Director – Legislative & Government Affairs
Department of Health Care Services	Caitlin Nord*	Staff Services Manager – Legislative & Government Affairs
Department of Health Care Services	Michelle Touhey*	Staff Services Manager – Legislative & Government Affairs
Department of Health Care Services	Melinda Castro*	Staff Services Manager – Legislative & Government Affairs
Department of Health Care Services	Krissi Khokhobashvili*	Deputy Director – Office of Communications
Department of Health Care Services	Andrea Tovar*	Staff Services Manager – Office of Communications Social Media Team
Department of Health Care Services	Lori Walker*	Deputy Director & Chief Financial Officer
Department of Health Care Services	Ryan Woolsey*	Division Chief – Fiscal Forecasting Division
Department of Health Care Services	Alex Mojtahedi*	Branch Chief – Fiscal Forecasting Division

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Department of Health Care Services	Celine Donaldson*	Branch Chief – Fiscal Forecasting Division
Department of Health Care Services	Jerrold Anub*	Branch Chief – Fiscal Forecasting Division
Department of Health Care Services	Cang Ly*	Branch Chief – Fiscal Forecasting Division
Department of Health Care Services	Jessica Bogard*	Division Chief, Financial Management Division
Department of Health Care Services	Mindy Xu*	Branch Chief, Financial Management Division
Department of Health Care Services	Staci Fukuoka*	Branch Chief, Financial Management Division
Department of Health Care Services	Saleshni Singh*	Branch Chief, Financial Management Division
Department of Health Care Services	Brandon Creel*	Branch Chief, Financial Management Division
Department of Health Care Services	Brian Dougherty*	Deputy Director, Administration
Mental Health Services Oversight and Accountability Commission	Amariani Martinez*	Associate Governmental Program Analyst
Mental Health Services Oversight and Accountability Commission	Andrea Anderson*	Information Officer
Mental Health Services Oversight and Accountability Commission	Andrej Delich*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Annie Palmero*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Antonio Andres*	Information Technology Associate
Mental Health Services Oversight and Accountability Commission	Boyang Fan*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Brittany Scangarello*	Associate Governmental Program Analyst
Mental Health Services Oversight and Accountability Commission	Catina Walker*	Health Program Specialist

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Mental Health Services Oversight and Accountability Commission	Charles Lee*	Information Technology Associate / Information Services Officer
Mental Health Services Oversight and Accountability Commission	Chelsea Yuen*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Cheryl Ward*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Chuenta Rhym*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Cody Scott*	Associate Governmental Program Analyst
Mental Health Services Oversight and Accountability Commission	Courtney Ackerman*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Daniel Owens*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Danielle Fischer*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Evonna McIntosh*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Grace Reedy*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Jeremy Klobas*	Chief Information Officer / Information Technology Associate
Mental Health Services Oversight and Accountability Commission	Jigna Shah*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Jorgen Gulliksen*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Joseph Vecchi*	Associate Governmental Program Analyst

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Mental Health Services Oversight and Accountability Commission	Justin Marshall*	Information Officer
Mental Health Services Oversight and Accountability Commission	Kai Lemasson*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Kali Patterson*	Research Scientist Manager
Mental Health Services Oversight and Accountability Commission	Kallie Clark*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Kara Starbird*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Kate Dvoretzskikh*	Associate Governmental Program Analyst
Mental Health Services Oversight and Accountability Commission	Katie McKenzie *	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Kelsey Wood*	Associate Governmental Program Analyst
Mental Health Services Oversight and Accountability Commission	Kendal Vargas*	Associate Governmental Program Analyst
Mental Health Services Oversight and Accountability Commission	Kendra Zoller*	CEA / Deputy Director of Legislation
Mental Health Services Oversight and Accountability Commission	Kimberly Watkin*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Latonya Harris*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Lauren Quintero*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Lawrence Naidu *	Information Technology Associate

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Mental Health Services Oversight and Accountability Commission	Lester Robancho*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Marcus Galeste*	Senior Researcher
Mental Health Services Oversight and Accountability Commission	Maureen Reilly*	Retired Annuitant / Attorney
Mental Health Services Oversight and Accountability Commission	Melissa Mollard*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Michele Nottingham*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Nai Saechao*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Norma Pate*	CEA / Deputy Director of Administration
Mental Health Services Oversight and Accountability Commission	Rachel Heffley*	Information Technology Associate
Mental Health Services Oversight and Accountability Commission	Reem Shahrouri *	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Riann Kopchak*	Staff Services Manager
Mental Health Services Oversight and Accountability Commission	Sara Yeffa*	Information Officer
Mental Health Services Oversight and Accountability Commission	Sarah Weber*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Shannon Tarter*	Health Program Specialist
Mental Health Services Oversight and Accountability Commission	Tom Orrock*	CEA / Deputy Director of Programs

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Mental Health Services Oversight and Accountability Commission	Xing Shen*	Research Scientist
Mental Health Services Oversight and Accountability Commission	Toby Ewing*	Former Executive Director
Mental Health Services Oversight and Accountability Commission	Will Lightbourne*	Interim Executive Director

***People v. Meta Products – Proposed Search Parameters for California Health Agencies
(CalHHS, DHCS, MHSOAC) –12/9/24***

I. Search Strings

California proposes a single set of terms for its three health agencies, the California Department of Health and Human Services (CalHHS), the Department of Health Care Services (DHCS), and the Mental Health Services Oversight and Accountability Commission (MHSOAC). (See Section I.) One of these three agencies, CalHHS, agrees to run additional strings based on Meta’s counterproposals where those additional strings yielded tailored review sets. (See Section II). Non-duplicated search counts, where available, are listed in brackets after each string.

As an additional means of gathering so-called “alternative cause” records, these agencies are willing to supplement productions from the review set with targeted self-collections consisting of final reports published by the responding agency to an external audience concerning each alternative-cause subject as it relates to children and teens.

CalHHS, DHCS, and MHSOAC

- A. ***Any of*** [meta, facebook, instagram, messenger, whatsapp, youtube, tiktok, twitter, snap!, roblox, discord, reddit, tumblr, twitch, pinterest, “horizon worlds”] ***AND any of*** [child!, youth!, kids, teen!, adolescent!, “young user,” “young users,” “young adult,” “young adults”] ***AND*** [“social media” ***w/15 of any of*** [health, brain, addict!, harm!, depress!, anxi!, sleep, suicid!, self-harm, compulsive, “eating disorder,” “eating disorders,” “substance abuse,” “drug abuse,” COVID, pandemic, quarantine, well-being, wellbeing, benefit!, encourag!, effect!, impact!]]¹ [CalHHS: 22,719; DHCS: 77,198; MHSOAC: TBD]
- B. ***Any of*** [child!, youth!, kids, teen!, adolescent!, “young user,” “young users,” “young adult,” “young adults”] ***AND*** [“social media” ***w/10 of any of*** [grant!, bill!, legislat!]] [CalHHS: 4,845; DHCS: 20,915; MHSOAC: TBD]
- C. social media” ***AND any of*** [“algorithmic recommendation,” “algorithmic sequencing,” “image filters,” “multiple user accounts,” “infinite scroll,” “ephemeral content features,” “autoplay,” “quantification of likes,” “display of likes,” “audiovisual alerts,” “haptic alerts”] [CalHHS: 270; DHCS: 1,172; MHSOAC: 31]
- D. ***Any of*** [“Senate Bill 976,” SB976, “SB 976,” “Senate Bill 60,” SB60, “SB 60,” “Assembly Bill 587,” AB587, “AB 587,” “Assembly Bill 2273,” AB2273, “AB 2273,” “Assembly Bill 1934,” “AB 1934,” AB1934, “Assembly Bill 1949,” AB1949, “AB1949”] ***AND any of*** [child!, kids, youth!, teen!, adolescent!, “young user,” “young

¹ Search String I.A is intended to reach records addressing what Meta refers to as alternative causes such as drug abuse and the pandemic, records concerning positive effects of social media upon young users, and efforts by state agencies to promote social media use among young users. It encompasses the subject matter of multiple different search strings proposed by Meta.

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users,” “young adult,” “young adults”] **AND** “social media” [CalHHS: 2,729; DHCS: 2,700; MHSOAC: TBD]

E. “youth risk behavior survey” [CalHHS: 1,720; DHCS: 5,980; MHSOAC: 18]

Additional Strings for CalHHS Only

Subject to and without waiving its objections to Meta’s proposals, CalHHS agrees to run the following additional strings that are based on Meta’s counterproposal, because they returned relatively low search results against that agency’s custodial data, .

F. **Any of** [child!, youth!, kids, teen!, adolescent!, “young user,” “young users,” “young adult,” “young adults”] **AND** [“screen time”] **AND any of** [report!, stud!, article!] [2,137]

G. **Any of** [“pro-ana”, “BMI”, obes!, anorexi!, bulimi!, orthorexi!, dysmorph!, binge, purge, suicid!, “self harm”, “self-harm”, selfharm, unalive, cutting!] **AND any of** [child!, youth!, kid!, teen!, tween!, adolescen!, young,, minor, underage!, under-age!, juvenile!, pre-teen!, preteen!, U18, “under 18”, U13, “under 13”, gen! w/5 z, “gen-z”, gen! w/5 alpha, gen-a!, student!, school!] [1,002]

H. **Any of** [eat! w/3 (problem!, issue!, trouble!, difficult!, disorder!, disab!, agitat!, behav!, insufficient, depriv!)] [250]

I. **Any of** [sleep! w/3 (problem!, issue!, trouble!, difficult!, disorder!, disab!, agitat!, behav!, insufficient, depriv!)] [1,541]

J. **Any of** [compar! w/5 (appearance, social, other!, negative)] [9]

K. **Any of** [body w/3 (accept!, dissatisfaction, positiv!, image, dysmorph!)] [1,692]

II. Custodians

California proposes the following custodians:

CalHHS

1. Kim Johnson, Secretary
2. Virginia Franco, Special Assistant to the Secretary
3. Brendan McCarthy, Acting Undersecretary
4. Tran Duong, Staff Services Manager
5. Jared Goldman, General Counsel
6. Maggie Schuster, Attorney
7. Daniel Torres, Chief Equity Officer
8. Maureen Keffer, Assistant Equity Officer

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9. John Ohanian, Director and Data Officer
10. Adam Dondro, Agency Information Officer
11. Sonia Herrera, Deputy Secretary for Office of Administrative Services (OAS)
12. Miguel Juaregui, Retired Annuitant, Information Technology Specialist, OAS
13. Miguel Salazar, Information Technology Specialist, OAS
14. Faisal Aziz, Information Technology Specialist, OAS
15. Sarah Aguirre, Staff Services Manager, OAS
16. Evan Gerber, Information Technology Associate, OAS
17. Francis Brown, Administrative Assistant, OAS
18. Samantha Lui, Deputy Secretary for Office of Legislative Affairs (OLA)
19. Sarah Logue, Associate Secretary, OLA
20. Anya Shutovska, Associate Secretary, OLA
21. Eric Castillo, Associate Governmental Program Analyst, OLA
22. Susan Bernier, Associate Governmental Program Analyst, OLA
23. Allyson Velez, Associate Governmental Program Analyst, OLA
24. Kimberly Chen, Acting Deputy Secretary for Office of Program and Fiscal Affairs (OPFA)
25. Darci Delgado, Assistant Secretary, OPFA
26. Julie Souliere, Assistant Secretary, OPFA
27. Jones, Assistant Secretary, OPFA
28. Debra Cooper, Assistant Secretary, OPFA
29. Nathaniel Mitchell, Assistant Secretary, OPFA
30. Sami Gallegos, Deputy Secretary for Office of External Affairs (OEA)
31. Jim Suennen, Associate Secretary, OEA
32. Rodger Butler, Assistant Secretary, OEA
33. Vincent Martinez, Information Officer, OEA
34. Juliann Binder, Information Officer, OEA
35. Corrin Buchanan, Deputy Secretary for Office of Policy and Strategic Planning (OPSP)
36. Josephina Baca, Staff Services Analyst, OPSP
37. Sohil Sud, Director of Children and Youth Behavioral Health Initiative (CYBI)
38. Stefanie Boltz, Health Program Specialist, CYBI
39. Brittney Blake, Staff Services Manager, CYBI
40. Stephanie Welch, Deputy Secretary for Office of Behavioral Health (OBH)
41. Anh Thu Bui, Public Health Medical Administrator, OBH
42. Austin Dickman, Staff Services Manager, OBH
43. Ali Vangrow, Staff Services Manager, OBH

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44. Hailey Shapiro, Associate Governmental Program Analyst, OBH
45. Diana Ramos, Surgeon General (OSG)
46. Alana Bui, Staff Service Manager, OSG
47. Lauren Groves, Special Advisor, OSG
48. Colette Cobb, Health Program Specialist, OSG
49. Julie Rooney, Director of Communications, OSG
50. Berit Mansour, Communications Support, OSG
51. Juan Carlos Arguello, Chief Health Policy Officer, Office of Youth and Community Restoration
52. Barbara Clopton, Communications Staff Services Manager, Center for Data Insights and Innovation (CDII)
53. Jaykob Zaleski, Communications Associate Governmental Program Analyst, CDII
54. David Reiner, California Initiative to Advance Precision Medicine (CIAPM)
55. Theresa Spezzano, Equity Officer, CIAPM
56. Ramon Martinez, Science Communications Officer, CIAPM
57. Saga Barberis, Project Administrator, CIAPM

DHCS

1. Paula Wilhelm, Deputy Director – Behavioral Health
2. Erika Cristo, Asst. Deputy Director – Behavioral Health
3. Marlies Perez, Division Chief – Community Services Division
4. Ilana Rub, Asst. Division Chief – Community Services Division
5. Denise Galvez, Branch Chief – CSD Prevention & Youth Branch
6. Autumn Boylan, Deputy Director – Office of Strategic Partnerships
7. Carol Gallegos, Deputy Director – Legislative & Government Affairs
8. Melissa Rolland, Asst. Deputy Director – Legislative & Government Affairs
9. Caitlin Nord, Staff Services Manager – Legislative & Government Affairs
10. Michelle Touhey, Staff Services Manager – Legislative & Government Affairs
11. Melinda Castro, Staff Services Manager – Legislative & Government Affairs
12. Krissi Khokhobashvili, Deputy Director – Office of Communications
13. Andrea Tovar, Staff Services Manager – Office of Communications Social Media Team
14. Lori Walker, Deputy Director & Chief Financial Officer
15. Ryan Woolsey, Division Chief – Fiscal Forecasting Division
16. Alex Mojtahedi, Branch Chief – Fiscal Forecasting Division
17. Celine Donaldson, Branch Chief – Fiscal Forecasting Division
18. Jerrold Anub, Branch Chief – Fiscal Forecasting Division
19. Cang Ly, Branch Chief – Fiscal Forecasting Division

***People v. Meta Products – Proposed Search Parameters for California Health Agencies
(CalHHS, DHCS, MHSOAC) –12/9/24***

20. Jessica Bogard, Division Chief, Financial Management Division
21. Mindy Xu, Branch Chief, Financial Management Division
22. Staci Fukuoka, Branch Chief, Financial Management Division
23. Saleszni Singh, Branch Chief, Financial Management Division
24. Brandon Creel, Branch Chief, Financial Management Division
25. Brian Dougherty, Deputy Director, Administration

MHSOAC

1. Amariani Martinez, Associate Governmental Program Analyst
2. Andrea Anderson, Information Officer
3. Andrej Delich, Health Program Specialist
4. Annie Palmero, Staff Services Manager
5. Antonio Andres, Information Technology Associate
6. Boyang Fan, Research Scientist
7. Brittany Scangarello, Associate Governmental Program Analyst
8. Catina Walker, Health Program Specialist
9. Charles Lee, Information Technology Associate / Information Services Officer
10. Chelsea Yuen, Health Program Specialist
11. Cheryl Ward, Health Program Specialist
12. Chuenta Rhym, Health Program Specialist
13. Cody Scott, Associate Governmental Program Analyst
14. Courtney Ackerman, Research Scientist
15. Daniel Owens, Health Program Specialist
16. Danielle Fischer, Staff Services Manager
17. Evonna McIntosh, Health Program Specialist
18. Grace Reedy, Health Program Specialist
19. Jeremy Klobas, Chief Information Officer / Information Technology Associate
20. Jigna Shah, Staff Services Manager
21. Jorgen Gulliksen, Staff Services Manager
22. Joseph Vecchi, Associate Governmental Program Analyst
23. Justin Marshall, Information Officer
24. Kai Lemasson, Research Scientist
25. Kali Patterson, Research Scientist Manager
26. Kallie Clark, Research Scientist
27. Kara Starbird, Health Program Specialist
28. Kate Dvoretzskikh, Associate Governmental Program Analyst

***People v. Meta Products – Proposed Search Parameters for California Health Agencies
(CalHHS, DHCS, MHSOAC) –12/9/24***

29. Katie McKenzie , Health Program Specialist
30. Kelsey Wood, Associate Governmental Program Analyst
31. Kendal Vargas, Associate Governmental Program Analyst
32. Kendra Zoller, CEA / Deputy Director of Legislation
33. Kimberly Watkin, Staff Services Manager
34. Latonya Harris, Research Scientist
35. Lauren Quintero, Staff Services Manager
36. Lawrence Naidu , Information Technology Associate
37. Lester Robancho, Health Program Specialist
38. Marcus Galeste, Senior Researcher
39. Maureen Reilly, Retired Annuitant / Attorney
40. Melissa Mollard, Research Scientist
41. Michele Nottingham, Health Program Specialist
42. Nai Saechao, Health Program Specialist
43. Norma Pate, CEA / Deputy Director of Administration
44. Rachel Heffley, Information Technology Associate
45. Reem Shahrouri , Health Program Specialist
46. Riann Kopchak, Staff Services Manager
47. Sara Yeffa, Information Officer
48. Sarah Weber, Health Program Specialist
49. Shannon Tarter, Health Program Specialist
50. Tom Orrock, CEA / Deputy Director of Programs
51. Xing Shen, Research Scientist
52. Toby Ewing, Former Executive Director
53. Will Lightbourne, Interim Executive Director

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

DECLARATION OF MICHAEL MCKIBBEN

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION THIS
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, Michael McKibben, declare as follows:

2 1. I am employed as an information security engineer with the Information Security
3 Office, Enterprise Technology Services, at the California Department of Health Care Services
4 (DHCS). I make this declaration based on personal knowledge of the facts herein based on my
5 experience as an information security engineer at the Department of Health Care Services, and, if
6 called to testify about its contents, could and would do so competently.

7 2. I am one of two IT professionals currently working on discovery requests from Meta
8 in this litigation. E-discovery and litigation support are normally a minimal part of our team's
9 workload. The majority of our workload consists of email and information security, including
10 email firewall security and blocking and bypassing firewalls for URLs.

11 3. Regarding time and personnel constraints, the other information security engineer
12 working on this matter and I address all email security issues throughout the Department and are
13 the first operational response for those issues. This includes, for example, addressing phishing
14 email attempts made throughout the Department. This aspect of our work is difficult to predict
15 and when matters do arise, they must be resolved immediately and are prioritized until they are
16 resolved.

17 4. Our IT department has only limited experience with e-discovery and litigation
18 support, and I have been involved in significant electronic discovery in just one other case
19 involving the Department. That other discovery matter spanned several months.

20 5. I have been asked to run search strings across departmental data to determine the
21 number of files that fit the given search parameters and provide the search result data to our legal
22 counsel. Our IT department uses Microsoft Content Search, which searches Microsoft's suite of
23 programs, for this purpose.

24 6. An obstacle we have faced in generating the requested search term reports is
25 translating the search strings provided to us into terms and strings using syntax that Microsoft
26 Content Search recognizes. Translating ten search strings into the correct syntax can take more
27 than three hours depending on the length and complexity of the search strings. Addressing and
28 resolving syntax issues is time intensive.

1 7. In addition to translating the search strings, in the event an error occurs during a
2 search, we must diagnose and resolve the error. This is done manually and involves individual
3 review of the search or other potential issues, such as a network issue, corruption of some kind, or
4 an error in the search terms or syntax themselves. An error in the search strings can be as small
5 as an extra space between words or a misplaced comma. Once the issue is identified and
6 resolved, the search must be run anew.

7 8. How long it takes to execute a search depends on a variety of factors, some of which
8 are unpredictable and out of the IT team's control. For example, searches will take longer if there
9 is increased traffic on the Department's computer network.

10 9. The length of search time is often attributable to the breadth of information to be
11 searched or the particular search terms included in a search string. In general, the broader the
12 search terms, the more time it takes to run that particular search because the search returns more
13 hits. The narrower or more specific the search terms, the faster a search can return results.

14
15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true.

17 Executed on 5th day of December, 2024, in Sacramento, California.

18
19 /s/ Michael McKibben
20 Michael McKibben
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People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

DECLARATION OF SANDRA GALLARDO

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION THIS
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, Sandra Gallardo, declare as follows:

2 1. I am employed as the Chief Counsel for the California Mental Health Services
3 Oversight and Accountability Commission. I started this role on May 1, 2024. I make this
4 declaration based on personal knowledge of the facts herein based on my experience as Chief
5 Counsel at the Mental Health Services Oversight and Accountability Commission, and, if called
6 to testify about its contents, could and would do so competently.

7 2. The Commission is a small agency with about sixty employees and an IT department
8 with five full-time employees and one retired annuitant. One of those IT professionals is the
9 Chief Information Officer. Two of the IT personnel work exclusively with software and desktop
10 troubleshooting issues for agency staff and do not assist with discovery or litigation. The fifth
11 employee works as a project manager for the Commission.

12 3. This discovery matter is staffed by only one IT professional, Charles Lee. Mr. Lee
13 joined the Commission in July 2024 with no prior experience with e-discovery or litigation
14 support.

15 4. Mr. Lee spends the majority of his time on his numerous primary job responsibilities.
16 One of his main responsibilities is cybersecurity. It is Mr. Lee's responsibility to resolve
17 cybersecurity threats, educate the staff, and establish policies to prevent problems from occurring.
18 Cybersecurity is unpredictable and time sensitive, and when an issue arises, resolving it is Mr.
19 Lee's top priority.

20 5. Mr. Lee is also involved in implementing the technical changes for the Commission's
21 recent renaming, as required by Proposition 1, which was approved in March 2024. Mr. Lee is
22 responsible for changing the internal and public facing domain name including all associated
23 accounts and services to new names by January 1, 2025.

24 6. In addition to dealing with practical cybersecurity problems in his day-to-day work
25 and executing technical aspects of the renaming, Mr. Lee plays a large role in writing, updating,
26 and maintaining the Commission's IT policies and procedures.

27 7. Mr. Lee is also tasked with supporting the Commission's Criminal Justice
28 Information System compliance with over 500 policies required to satisfy state requirements.

1 8. Mr. Lee is the only staff member currently qualified to perform e-discovery and can
2 only devote a portion of his time to its completion, as the other critical work cannot be ignored or
3 otherwise delegated.

4 9. Due to budget constraints, the Commission utilizes Microsoft Purview eDiscovery
5 instead of purchasing expensive e-discovery software the Commission cannot afford.

6 10. Mr. Lee has been asked to run search strings across the Commission's data to
7 determine the number of files each search string returns and provide the results to the
8 Commission's legal counsel. Microsoft Purview eDiscovery could not access and search data
9 stored on disparate storage platforms because the software is limited to the Microsoft
10 environment. This required the Commission to copy and transfer 1.2 terabytes of data to a
11 location that could be accessed by Microsoft Purview eDiscovery, a process that took three
12 weeks.

13 11. Mr. Lee has also experienced unexpected software issues and processing delays. For
14 example, Microsoft Purview eDiscovery limits the number of concurrent searches a user can run
15 simultaneously.

16 12. Microsoft Purview eDiscovery does not have deduplication capabilities, meaning that
17 the number of hits resulting from a search cannot be reduced on account of duplicate files.

18 13. In doing e-discovery for the first time, Mr. Lee has run into other unanticipated
19 problems. Mr. Lee discovered that Microsoft Purview eDiscovery requires different search
20 criterion for searching different platforms. For instance, email searches require different search
21 terms than searches on other platforms. For email, limiting a date range requires using the search
22 criterion "sent>=2012-01-01," but searching non-email files requires "created>=2012-01-01."
23 These types of issues slow down the process.

24 //

25 //

26 //

27 //

28

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true.

3 Executed on 5th day of December, 2024, in Sacramento, California.
4

5 
6 Sandra Gallardo